



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

SR-6J

March 12, 2015

Mr. Gary D. Uphoff
Principal
Environmental Management Services Company
5934 Nicklaus Drive
Fort Collins, Colorado 80528

Subject: Old American Zinc (OAZ) Superfund Site, Fairmont City, Illinois
Draft Remedial Design Work Plan dated January 8, 2015 and the Quality
Management Plan dated January 26, 2015

Dear Mr. Uphoff:

The United States Environmental Protection Agency (EPA) has reviewed the Draft Remedial Design Work Plan (RDWP) dated January 8, 2015 and the Quality Management Plan (QMP) dated January 26, 2015 for the Old American Zinc Plant Site in Fairmont City, Illinois. EPA's comment on the RDWP is as follows:

EPA Response to Comment 7 of the RDWP – Section 2, page 3: Figure 7 of the Final Feasibility Study (FS) Report and Figure 8 of the Record of Decision (ROD) show affected sediments exceeding cleanup goals at the west ditch outfall. The ROD states that the remedy would include "Removal of affected soils and sediments outside the Facility Area to be managed with consolidated media inside the 35-acre consolidation area." Your response to the original comment states that "While the outfalls are part of the site as shown on Figure 1, no remedial action will be required on the outfall areas. No changes to the Work Plan were made to address this comment." This statement is inaccurate since there are affected sediments in the outfall area that need to be addressed in the remedial action as described in the FS and ROD. Please make sure that all of the affected sediments outside the Facility Area are addressed appropriately and modify the RDWP accordingly.

Overall the submitted QMP describes the quality system which is in compliance with EPA requirements. However, the following still needs to be addressed:

1. The document needs to be signed and dated by approval personnel.

2. The latest American National Standard ANSI/ASQ E4-2004 should be referenced throughout the document, not only in the beginning.

Please note, that ARCADIS must prepare new QMP in addition to the Quality Assurance Project Plan (QAPP) for any other Superfund Site in Region 5. ARCADIS, as well as any other Blue Tee contractors, must reference and use the UFP-QAPP format for any new Superfund projects in Region 5.

Please submit a revised RDWP and QMP that incorporates all comments within 30 days of receipt of this letter. If you have any questions or comments regarding this letter, please contact me at (312) 353-4150 or via email at desai.sheila@epa.gov.

Sincerely,



Sheila Desai
Remedial Project Manager

cc: Michael Haggitt, Illinois EPA
Rachel Grand, CH2M Hill